

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

Case No. 18-cr-20800-1

v.

Hon. Stephen J. Murphy, III

D-1, RAJENDRA BOTHRA,

Defendant.

_____ /

**STIPULATED ORDER RE-ISSUING CHECKS
POST-INDICTMENT**

Plaintiff, the United States of America, by and through its Counsel, Matthew Schneider, United States Attorney, and Shankar Ramamurthy, Assistant United States Attorney, and Defendant Rajendra Bothra, with his Attorney, Anjali Prasad, hereby stipulate, as evidenced by their signatures below, to the immediate entry of this stipulated order requiring financial institutions to re-issue the following checks to the order of the U.S. Marshals Service (collectively referred to as “Subject Checks”):

- a. Cashier’s Check issued by Comerica Bank, dated April 12, 2019, paid to the order of Interventional Pain Center PLLC in the amount of Two Dollars and Sixty Seven Cents in U.S. Currency (\$2.67);
- b. Cashier’s Check issued by Comerica Bank, dated April 12, 2019, paid to the order of The Pain Center USA PLLC in the amount of Sixty Eight Thousand Three Hundred and Eighty One Dollars and Sixty Four Cents in U.S. Currency (\$68,381.64).

IT IS HEREBY ORDERED AND DECREED THAT:

1. Pursuant to 21 U.S.C. § 853(e)(1), this Court is authorized to enter a

this order to preserve the availability of property subject to forfeiture.

2. Dr. Bothra stipulates that he received the following checks, collectively referred to as the Subject Checks:

- a. Cashier's Check issued by Comerica Bank, dated April 12, 2019, paid to the order of Interventional Pain Center PLLC in the amount of Two Dollars and Sixty Seven Cents in U.S. Currency (\$2.67);
- b. Cashier's Check issued by Comerica Bank, dated April 12, 2019, paid to the order of The Pain Center USA PLLC in the amount of Sixty Eight Thousand Three Hundred and Eighty One Dollars and Sixty Four Cents in U.S. Currency (\$68,381.64).

3. Dr. Bothra Stipulates that he was the sole signatory on bank accounts held at Comerica Bank in the name of Interventional Pain Center PLLC and The Pain Center USA PLLC.

4. Dr. Bothra stipulates that he was the sole owner of Pain Center PLLC and The Pain Center USA PLLC.

5. Dr. Bothra, by and through this stipulation, authorizes Comerica Bank to re-issue the Subject Checks, to be paid to the order of the U.S. Marshals Service.

6. Comerica Bank is ordered to remit to the United States within ten days of service of this order, a check in the following amounts, paid to the order of the U.S. Marshals Service (collectively referred to as the "Re-issued Subject Checks"):

- a. Two Dollars and Sixty Seven Cents in U.S. Currency (\$2.67);
- b. Sixty Eight Thousand Three Hundred and Eighty One Dollars and Sixty Four Cents in U.S. Currency (\$68,381.64).

7. The U.S. Marshals Service is ordered to deposit the Re-issued Subject

Checks into the Department of Justice Seized Asset Deposit Fund and maintain the funds pending further order from this court.

8. Any third party claims to the Restrained Funds may be properly brought and resolved in ancillary proceedings conducted by this Court following the execution of a Preliminary Order of Forfeiture in accordance with the provisions of Federal forfeiture law.

9. This Court may issue any further orders necessary to effectuate the terms and/or purposes of this order, which purposes include preserving the availability and value of funds derived from the Re-issued Subject Checks.

10. The United States is authorized and directed to serve a copy of this Restraining Order on the relevant financial institutions for the purpose of obtaining checks paid to the order of the U.S. Marshals Service in the amounts set forth in paragraph 3.

11. Nothing in this Order shall be construed as an admission of liability on the part of the Dr. Bothra, and Dr. Bothra will retain all rights to challenge any Government forfeiture of the funds at a later date

12. The terms of this Restraining Order shall remain in full force and effect until further order of this Court.

SO ORDERED.

Dated: July 11, 2019

s/Stephen J. Murphy, III
STEPHEN J. MURPHY, III
United States District Court Judge

MATTHEW SCHNEIDER
United States Attorney

s/Shankar Ramamurthy
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Dated: July 11, 2019

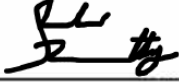
s/Anjali Prasad – See Attached
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Dated: July 11, 2019

Rajendra Bothra – See Attached
Dr. Rajendra Bothra
Defendant

Dated: July 11, 2019

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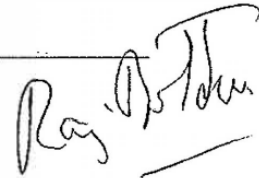
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Dated: July 11 2019

Dr. Rajendra Bothra
Defendant



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